

RISK ASSESSMENT PROTOCOLS

1. Request for Risk Assessment. The risk assessor shall receive a request for inspection containing: a) the dollar hard cost - Category: \$5,001 - \$25,000 and excess of \$25,001; 2) a location-by-location listing of the painted surfaces that will be disturbed during the planned renovation. This shall include interior, exterior, outbuilding and soil surfaces.
2. Lead Poisoning Hazards. The risk assessment is to identify and quantify conditions that may result in adverse human health effects from the following lead sources: Deteriorated, nonintact lead-based paint; Interior dust lead hazards; Exterior soil lead hazards; Chewable surfaces; Friction surfaces, and Impact surfaces.
3. Interviewing Occupants (if occupied). The risk assessor shall use a standardized resident questionnaire to collect information on: the age of the building, the occupants, their ages, specifically looking for children under the age of 6, pregnant females and legal places of residence.

NOTE: Child Resident Definition: A child only resides in a home if it is their legal address or there is a joint custody agreement. Children who are visiting and day care facilities, while important to be aware of, are not considered resident children. A child by definition must be 6 or under.

4. Interviewing Owner/Operator (optional). The risk assessor, if possible, may interview the property owner to identify lead-safe work practices in both past maintenance and proposed renovation.
5. XRF Testing. Moving location by location, the risk assessor shall sample all components listed to be disturbed by the renovation as well as any surface that is visually deteriorated, i.e. chipping, flaking, peeling, chalking. Intact painted surfaces which are not to be disturbed will not be sampled. For example, if windows do not exhibit visible friction damage and they are not to be disturbed, they will not be sampled with the XRF.

A. Component Sampling

Window – If a single window is to be tested as a representative of the entire structure, the following window components shall be evaluated: the sash, the exterior jamb, the exterior casing, the exterior trough, the interior sash, the interior jamb, the interior casing and the sill. Windows with the same paint history need not be retested.

Doors – Doors shall be tested on the jamb, the door itself and the door casing.

B. Component Identification Codes

All testing shall include the following identification items:

The room, the large component, the wall, the quantity on the wall, the actual test component and a location description. For example: Living room/window/C-2/sash/upper

6. Dust Wipe Sampling. The risk assessment shall require at least 8 single dust wipe samples split between floor and interior window sill locations in rooms most highly occupied by young children. No trough samples shall be taken. A blind blank to check for laboratory quality and supplies contamination shall be submitted after wiping the inspector's gloved hands. If, and only if floor samples are contaminated above the threshold of 40µg/SF, will any friction and/or impact surfaces require treatment.

Location Codes. Dust samples shall be identified by the room, the closest friction component, a window or door, the wall and a number. For example: Living room/door/C-5/right

7. Bare Soil Testing. Soil shall be composite tested anytime more than 9 square feet of bare soil can be visually identified by the risk assessor. The sample shall be comprised of at least 2 and up to 8 subsamples of the top 1/2 inch of bare, mid yard soil. The soil threshold is 1200 ppm of the arithmetic mean of a composite sample.

Play area for children under 6, if identified by the risk assessor or parent in the initial interview, shall be sampled irrespective of size with a composite of at least 5 subsamples of the top 1/2 inch of soil for small areas and up to 10 subsamples for large areas.

8. Minimum Report Requirement. The report shall comply with the prototype report at Addenda A to the maximum possible. The risk assessment report shall contain the following:
 - A. Required Notice. Occupant disclosure sheets that comply with HUD's Notice of Lead Hazard Evaluation
 - B. Basic Summary. A summary written in English understandable to a nonprofessional whenever possible, avoiding legal, technical or construction jargon. The first paragraph shall list groups of surfaces with lead-based paint or showing lead-based paint hazards. The second paragraph shall include an outline of the recommended treatments.
 - C. Data Collected. Standard field questionnaires shall follow and then all field testing and laboratory results of XRF, dust and soil.
 - D. Recommended Hazard Reduction Specification. For jobs in the \$5,000 - \$25,000 category, acceptable options shall be presented to address each hazard using both interim controls and abatement with a strong emphasis on the interim control option. Over \$25,000, only abatement options shall be provided.

9. Hazard Control Recommendations

A. Minimum Reporting Requirements

Exemptions. List all exemptions this household or unit is entitled to, for example: the historic exemption, or interior rooms where lead is not to be disturbed above the de minimis, the safe work practice exemption as well as the clearance exemption.

Below Threshold Recommendations. The report should not include any recommendations for lead hazard reduction in cases where the component, be it soil, dust or paint, is below the threshold definition of a hazard. An individual firm may put a two or three line disclaimer about readings below the threshold and the universal appropriateness of safe work practices, but no recommendations shall be included for areas below the threshold.

B. Required Interim Control Strategies \$5000 - \$25,000.

1. Friction Surfaces

Friction surfaces shall be treated if and only if:

- The dust sample closest to the friction surface is equal to or above the floor threshold of 40 µg/SF or in the case of windows, the interior sill is in excess of the 250 µg/SF threshold
- Paint is subject to abrasion
- The component is lead-containing due to an XRF test or similar painting history of an identical component in the room.

2. Impact Surfaces

Impact surfaces shall be treated if they are:

- Impact surface
- Visually damaged or deteriorated
- The damage is caused by a building component (door knob, door frame)
- The surface contains more than 1.0 mg/cm² of lead per an XRF test or similar painting history of an identical component in the room.

3. Chewable surfaces shall only be treated if they are:

- Chewable surfaces: interior and exterior
- Evidence of teeth marks from current occupant under the age of 6.
- Component contains more than 1.0 mg/cm² lead per XRF test or similar painting history of an identical component in the room.

4. Soil Strategies

- Nonplay area/bare spots – between 1,200 ppm and 5,000 ppm the soil shall be covered with at least 6 inches of mulch or gravel containing less than 200 ppm of lead. Soil in excess of 5,000 parts per million shall be abated with a 20 year treatment
- Play area soil – Play areas of resident children under 6 in excess of 400 parts per million shall be addressed with interim control or abatement depending on the hard cost of the rehabilitation

10. Specifications

Acceptable treatments shall be first selected from the items available on the National Center for Lead-Safe Housing's Library of Specifications (Addenda B). These treatments can be clearly understood and executed by the program. Unique or unusual situations may be addressed by the risk assessor developing their own specification in conjunction with the program's rehab specialist or project administrator.

11. Optional

The building condition survey shall be optional in all rehabilitation program risk assessments because these properties are undergoing rehabilitation and shall have no HQS violations when completed.

The re-evaluation recommendations shall be directed to the property owner in a rehabilitation program risk assessment. Recommendations should be included in a Clearance Report and combined Notice of Lead Hazard Reduction and Clearance Inspection Report.